

Exhibit #12, and prayed to be incorporated herein, said Will devising all real estate unto Catherine M. Watkins, sister of Sarah E. Cutsail.

ELEVENTH: That by virtue of the foregoing, a question has been raised as to whether your petitioners have a good and marketable title to the property described in paragraphs First, Second and Third herein, by reason of the fact that there appears to be: (a) a gap between the fee simple owner of said property in 1881 (Sarah Cutsail, by virtue of the deed attached hereto as Exhibit #11), and the fee simple owners in 1911, as reflected in the deed from Alvie C. Cutsail, et ux, Lucy May Davidson, et vir., and Edith Virginia Schoppert, et vir., conveying a  $\frac{3}{5}$  interest in said property to George H. Cutsail and Etta M. Cutsail (Exhibit #9); (b) a possible duplicate conveyance of the same tract by the Grantors in Exhibit # 9 and the 1927 Will of Sarah E. Cutsail devising all realty unto Catherine M. Watkins (Exhibit # 12); and (c) an outstanding  $\frac{1}{5}$  interest in said property by virtue of the Alvie Cochell Cutsail deed (Exhibit # 9) which conveys only a  $\frac{3}{5}$  interest to George H. Cutsail, who was theoretically entitled to at least  $\frac{1}{5}$  by virtue of Will of his father, George W. Cutsail (Exhibit # 10), leaving outstanding and unaccounted for a  $\frac{1}{5}$  interest in said property.

TWELFTH: That your petitioners and their predecessors in interest have been in actual, exclusive, adverse and peaceable possession of the tracts of land which are the subject of this proceeding, namely the property described in paragraphs First, Second and Third herein, continuously under claim of right and color of title more than 20 years prior to the filing of this Bill of Complaint.

THIRTEENTH: That your petitioners believe and therefore aver that there is a cloud upon the title to their property and